eutelsat

Filed Electronically

August 15, 2014

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Amendment of the Commission's Rules with Regard to Commercial Operations in the 3550-3650 MHz Band, GN Docket No. 12-354

Dear Ms. Dortch:

Eutelsat Americas hereby submits the following comments in the above-captioned proceeding. Eutelsat Americas, part of the Eutelsat group of companies and one of the world's leading fixed-satellite service ("FSS") satellite operators,[1] operates several satellites with coverage of Mexico, the United States and other parts of the Americas in the conventional C-band frequencies (3700-4200 MHz).[2]

Eutelsat Americas' primary interest in this proceeding relates to the potential for interference into conventional C-band satellite receivers in Mexico (as well as the United States) from the out-of-band emissions of the proposed Citizens Broadband Radio Service ("CBRS") in the United States in the 3550-3650 (and possibly up to 3700) MHz band. Eutelsat Americas is also concerned about the potential for future in-band, cross-border interference from CBRS devices into satellite receivers in extended C-band frequencies (3500-3700 MHz) as these frequencies become available for FSS in Mexico.[3] Moreover, according to public information, there is a Mexican satellite already using Ext C band frequencies.

---

[1] On January 2, 2014 Eutelsat Communications announced the closing of the transaction to acquire 100% of the share capital of Satélites Mexicanos, S.A. de C.V. ("Satmex"). The Satmex entity is now doing business as Eutelsat Americas.

[2] EUTELSAT 113 West A (formally SATMEX 6), located at 113.0°W, EUTELSAT 115 West A (formally SATMEX 5), located at 114.9° West, and EUTELSAT 117 West A (formally SATMEX 8), located at 116.8° West, are on the Permitted Space Station List and provide coverage in conventional C-band frequencies.

[3] In 2013, the Instituto Federal de Telecomunicaciones ("IFT") announced the auction of the geostationary orbital positions 113° West and 116.8° West, and their associated C- and Ku-band frequencies. *Instituto Federal de Telecomunicaciones, Acuerdo por el que el Pleno del Instituto Federal de Telecomunicaciones aprueba el Programa de Licitación y Adjudicación de Frecuencias de Televisión Radiodifundida Digital, que se realizará durante el año 2014*, Diario Oficial de la Federación (Dec. 20, 2013), *available at* http://www.dof.gob.mx/nota_detalle.php?codigo=5327366&fecha=20/12/2013.

eutelsat

As part of the satellite community, Eutelsat Americas supports the numerous concerns expressed by the Satellite Industry Association ("SIA") to the Commission in this proceeding, including those raised in the various technical analyses filed with the FCC. The technical analysis on unwanted emission interference and the extensive record in the Radiocommunications Sector of the International Telecommunications Union ("ITU-R") concerning sharing between IMT-Advanced transmitters and C-band earth station receivers indicate that substantial separation distances will be necessary between terrestrial mobile transmitters and FSS earth station receivers to prevent unacceptable interference. Unless adequate safeguards are imposed by the Commission for the operation of CBRS transmitters in the 3550-3650 (and possibly up to 3700) MHz band, Eutelsat Americas' ability to continue providing services in the conventional C-band, and its future ability to use extended C-band frequencies in Mexico as well as the United States, would be at risk.

Eutelsat Americas requests that the Commission work to ensure existing and future satellite services within the United States and neighboring countries are not adversely affected by CBRS deployment in the United States in the 3550-3650 (and possibly up to 3700) MHz band.

Respectfully submitted,

Hector M. Fortis
Director, Regulatory and International Affairs
Paseo de la Reforma #222, floor 20
Col. Juarez, 06600
Mexico City
+52 55 26295829
hector.fortis@eutelsat.com